

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

AMY GUSTAFSON,

Plaintiff,

v.

**ALLSTATE VEHICLE AND PROPERTY
INSURANCE COMPANY,
an Illinois Corporation**

Defendant.

Case No. CIV-20-1136-R

PLAINTIFF'S FINAL WITNESS AND EXHIBIT LIST

COMES NOW Plaintiff Amy Gustafson and pursuant to the Court's Scheduling Order [Doc. 16], submits the following Final Witness and Exhibit List in the above matter.

A. WITNESSES WHO WILL BE CALLED TO TESTIFY

No.	WITNESS	EXPECTED TESTIMONY
1.	Amy Gustafson c/o Jacob L. Rowe Fulmer Sill PLLC 1101 N. Broadway Ave., Suite 102 Oklahoma City, OK 73103	Deposed.
2.	Ian Rupert c/o Ian's Enterprise 9450 S.W. Gemini Drive, #39525 Beaverton, OR 97008	Information related to the loss at issue and interactions with Defendant Allstate Vehicle and Property Ins. Co. related to the same.
3.	Brooke Morris	Knowledge and information

	c/o Ron Walker Jerry Noblin, Jr. TOMLINSON & McKINSTRY, PC Two Leadership Square, Suite 450 Oklahoma City, OK 73102	regarding Plaintiff's insurance claim, agreement with Allstate, and any other facts or circumstances relevant to this matter.
4.	Roshebra Dotry c/o Ron Walker Jerry Noblin, Jr. TOMLINSON & McKINSTRY, PC Two Leadership Square, Suite 450 Oklahoma City, OK 73102	Knowledge and information regarding Plaintiff's insurance claim, agreement with Allstate, and any other facts or circumstances relevant to this matter.
5.	Travis Clayborn c/o Ron Walker Jerry Noblin, Jr. TOMLINSON & McKINSTRY, PC Two Leadership Square, Suite 450 Oklahoma City, OK 73102	Knowledge and information regarding Plaintiff's insurance claim, agreement with Allstate, and any other facts or circumstances relevant to this matter.

B. WITNESSES WHO MAY BE CALLED IF THE NEED ARISES

6.	Sara Williams c/o Ron Walker Jerry Noblin, Jr. TOMLINSON & McKINSTRY, PC Two Leadership Square, Suite 450 Oklahoma City, OK 73102	Knowledge and information regarding Plaintiff's insurance claim, agreement with Allstate, and any other facts or circumstances relevant to this matter.
7.	Andrea Heitke c/o Ron Walker Jerry Noblin, Jr. TOMLINSON & McKINSTRY, PC Two Leadership Square, Suite 450 Oklahoma City, OK 73102	Knowledge and information regarding Plaintiff's insurance claim, agreement with Allstate, and any other facts or circumstances relevant to this matter.
8.	Brittney Triplett c/o Ron Walker Jerry Noblin, Jr. TOMLINSON & McKINSTRY, PC Two Leadership Square, Suite 450	Knowledge and information regarding Plaintiff's insurance claim, agreement with Allstate, and any other facts or circumstances relevant to this

	Oklahoma City, OK 73102	matter.
9.	Roshebra Dotrey c/o Ron Walker Jerry Noblin, Jr. TOMLINSON & McKINSTRY, PC Two Leadership Square, Suite 450 Oklahoma City, OK 73102	Knowledge and information regarding Plaintiff's insurance claim, agreement with Allstate, and any other facts or circumstances relevant to this matter
10.	Belinda Kervin c/o Ron Walker Jerry Noblin, Jr. TOMLINSON & McKINSTRY, PC Two Leadership Square, Suite 450 Oklahoma City, OK 73102	Knowledge and information regarding Plaintiff's insurance claim, agreement with Allstate, and any other facts or circumstances relevant to this matter
11.	Wayne Gustafson (Plaintiff's Father) 11413 E 100 Street N Owasso, OK 74055 (918) 810-4959	Knowledge and information regarding bad faith damages and stress related to Plaintiff's roof and any other facts or circumstances relevant to this matter
12.	DeAnn Gustafson (Plaintiff's Mother) 11413 E 100 Street N Owasso, OK 74055 (918) 408-5885	Knowledge and information regarding bad faith damages and stress related to Plaintiff's roof and any other facts or circumstances relevant to this matter
13.	Greg Gustafson (Plaintiff's brother) 17719 Meadow Grove Ln Dallas, TX 75287 (918) 361-6583	Knowledge and information regarding bad faith damages and stress related to Plaintiff's roof and any other facts or circumstances relevant to this matter
14.	Nick Mitchell 5016 N. Woodward Ave Oklahoma City, OK 73112 (405) 519-4192	Knowledge and information regarding bad faith damages and referral to Ian Rupert and any other facts or circumstances relevant to this matter
	Any and all witnesses necessary to identify and authenticate any and all exhibits/documents utilized in this case.	Identification and authentication of documents.

	Any person, employee, agent or otherwise of Allstate who spoke with Plaintiff concerning the claim	
	Any person noticed for a deposition.	
	Any person designated by a party in response to a Rule 30b6 deposition notice.	
	Any person any non-party may designate in response to a deposition subpoena.	
	Any witness identified by Defendants and not objected to by Plaintiffs.	
	Any expert witness designated by Defendants and not objected to by Plaintiffs.	
	Any witness identified through ongoing discovery and not objected to by Plaintiffs.	
	All witnesses deposed in this case not objected to by Plaintiffs.	
	Any additional witness with relevant testimony discovered as discovery process continues	

Plaintiff reserves the right to supplement this list of witnesses as discovery continues.

A. EXHIBITS TO BE USED

No.	Description	Bates No.
1.	Allstate Policy	A 000187-241; 000401-454
2.	Claim Notes	A 000001-38
3.	Claim File	A 000044-400
4.	First Notice of Loss Snapshot	A 000039-43

5.	Photographs of Plaintiff's Home	A 000242-249
6.	National Catastrophe Team Estimate	A 000250-332
7.	Ian's Enterprise inspection report and estimate to Allstate dated Oct. 12, 2019	A 000060-139; Gustafson 00014-96
8.	Field Roof Claim Assessment Form – Hail Damage	A 000455-457
9.	Allstate Insurance Co. Claims Operations Manual	A 000458-637
10.	Allstate Underwriting File	A 000638-745

B. EXHIBITS THAT MAY BE USED IF THE NEED ARISES

11.	Email communication between Ian Rupert and Allstate claims	Gustafson 00097-99; 101-105; 351-352
12.	Ian's Enterprise LLC Claim File	Gustafson 000356-363; IAN 1-611
13.	Ian Rupert text communications with Plaintiff	Gustafson 000365-399
	All documents Plaintiff has requested but Defendant has not yet produced.	
	All documents produced by Plaintiff and not objected to by Defendant	
	All documents produced by Defendant and not objected to by Plaintiff	
	All documents or demonstrative exhibits relied upon by expert witnesses.	
	Defendant's exhibits not objected to by Plaintiff.	
	All exhibits used in depositions not objected to by Plaintiff	

	Charts or enlargements of any party's exhibits not objected to by Plaintiff	
	Demonstrative exhibits (including computer generated demonstratives).	
	Any documents received by any party in response to a subpoena not already identified and not objected to by Plaintiff	
	Any documents produced by or received from any party pursuant to ongoing discovery	

Plaintiff reserves the right to supplement this list of exhibits as discovery continues.

Respectfully submitted,

/s/ Jacob L. Rowe

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of August, 2021, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Ronald L. Walker
Jerry D. Noblin, Jr.
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/s/ Jacob L. Rowe